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February 7, 2018

**BY ECF & FAX**

The Honorable Paul G. Gardephe, U.S.D.J.  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 705  
New York, NY 10007  
Fax: (212) 805-7986

Re: Request for an Extension of Time to Respond to Complaint and  
Adjournment of the Pre-Trial Conference  
*Alfredo Cruz Sanchez, et al. v. Rainbow Umbrella, et al.*  
Case No.: 17 Civ. 9065 (PGG)

Dear Judge Gardephe:

We are the attorneys for the Defendants in connection with the above-referenced wage and hour action.

We write on behalf of all of the parties to respectfully request a 30-day extension of time for Defendants to respond to the Complaint. Defendants' deadline to respond to the Complaint is currently February 9, 2018. Accordingly, the parties request that Defendants' deadline to respond to the Complaint be extended to March 12, 2018. This is the parties' first request for an extension of time to respond to the Complaint and is being made in light of the parties' ongoing settlement discussions, which, to date, have included exchanges of certain settlement proposals.

In the event the request for an extension of time to respond to the Complaint is granted, the parties respectfully request an adjournment of the initial conference, currently scheduled for February 15, 2018, at 10:30 am, to a date shortly after March 12, 2018 (i.e., the requested deadline to respond to the Complaint). Similarly, as a result of this request to adjourn the initial conference, the parties further request an extension of time to submit the joint letter and proposed case management plan, which is currently due on February 8, 2018.

All of the parties have agreed to the extensions of time requested herein.



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Thank you, Your Honor, for your consideration in this matter.

Respectfully submitted,

Joseph D. Lockinger

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